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UNITED STATES DISTRICT COURT

DISTRICT OF NEVADA

ORACLE USA, INC.. a Colorado corporation. ORACLE AMERICA, INC.. a Delaware corporation. and ORACLE INTERNATIONAL CORPORATION, a California corporation,
 	
        Plaintiffs,
 	
    v.
 	
RIMINI STREET, INC., a Nevada corporation. and SETH RAVIN, an individual,
 	
       Defendants.
	Case No. 2:10-cv-0106-LRH-VCF
	
	DECLARATION OF JACOB J.O. MINNE IN SUPPORT OF ORACLE'S RESPONSE TO RIMINI'S RESPONSE TO ORDER TO SHOW CAUSE
	
	PUBLIC REDACTED VERSION

1   I, Jacob J.O. Minne, declare as follows:

2   1.   I am an attorney admitted to practice law in the State of California and before the

3   Court in this action *pro hac vice*. I am an associate at Morgan, Lewis & Bockius LLP, counsel of

4   record for Plaintiffs Oracle USA, Inc., Oracle America, Inc., and Oracle International Corporation

5   (collectively "Oracle") in this action. I have personal knowledge of the facts stated below and

6   could and would testify to them if called upon to do so.

7   2.   Attached as Exhibit 4 is a true and correct copy of Oracle Deposition Exhibit 1832

8   which was introduced during the January 17, 2020 Rule 30(b)(6) Deposition of Craig Mackereth

9   taken as part of discovery in this action.

10   3.   Attached as Exhibit 5 is a true and correct copy of excerpts of Rimini Street Inc.'s

11   August 19, 2019 press release titled "Rimini Street Statement on U.S. Appeals Court Ruling,"

12   which is available here: https://www.rimini-street.com/press-releases/08192019.

13   4.   Attached as Exhibit 6 is a true and correct copy of Rimini Street, Inc.'s April 1,

14   2021 press release titled "Court Rules in Rimini Street's Favor on Key Matters, Denies Oracle

15   Motions and Cites 'Common Sense' and 'Absurd Result' in Denying Oracle Claims," which is

16   available here: https://www.riministreet.com/press-releases/court-rules-in-favor-on-key-matters/.

17   5.   Attached as Exhibit 7 is a true and correct copy of excerpts of the transcript of

18   Rimini Street, Inc.'s FQ1 2021 Earnings Call held on May 10, 2021.

19   6.   Attached as Exhibit 8 is a true and correct copy of excerpts of a document Rimini

20   produced to Oracle as part of discovery in this action as RSI007954243 (and associated

21   metadata).

22   7.   Attached as Exhibit 9 is a true and correct copy of excerpts of a document Rimini

23   produced to Oracle as part of discovery in this action as RSI007954231 (and associated

24   metadata).

25   8.   Attached as Exhibit 10 is a true and correct copy of excerpts of Oracle Deposition

26   Exhibit 1835 which was introduced during the January 17, 2020 Rule 30(b)(6) Deposition of

27   Craig Mackereth taken as part of discovery in this action.

28

DECLARATION OF JACOB J.O. MINNE IN SUPPORT OF ORACLE'S RESPONSE TO RIMINI'S
RESPONSE TO ORDER TO SHOW CAUSE

1   9.   Attached as Exhibit 11 is a true and correct copy of excerpts of the transcript from

2   the January 17, 2020 Rule 30(b)(6) Deposition of Craig Mackereth ("Mackereth Rule 30(b)(6)

3   Depo.") taken as part of discovery in this action.

4   10.   Attached as Exhibit 12 is a true and correct copy of excerpts of a document Rimini

5   produced to Oracle as part of discovery in this action as RSI007291141.

6   11.   Attached as Exhibit 13 is a true and correct copy of excerpts of a document Rimini

7   produced to Oracle as part of discovery in this action as RSI007291146.

8   12.   Attached as Exhibit 14 is a true and correct copy of excerpts of a document Rimini

9   produced to Oracle as part of discovery in this action as RSI007291065.

10   13.   Attached as Exhibit 15 is a true and correct copy of excerpts of a document Rimini

11   produced to Oracle as part of discovery in this action as RSI007494527.

12   14.   Attached as Exhibit 16 is a true and correct copy of excerpts of a document Rimini

13   produced to Oracle as part of discovery in this action as RSI007494523.

14   15.   Attached as Exhibit 17 is a true and correct copy of excerpts from the transcript of

15   the February 28, 2018 deposition of Richard Frank ("Frank Depo.") taken during the *Rimini II*

16   litigation.

17   16.   Attached as Exhibit 18 is a true and correct copy of excerpts of a document Rimini

18   produced to Oracle as part of discovery in this action as RSI007075263 containing pages with

19   Bates numbers RSI007075266 and RSI007075267.

20   17.   Attached as Exhibit 19 is a true and correct copy of excerpts of a document Rimini

21   produced to Oracle as part of discovery in this action as RSI007090478.

22   18.   Attached as Exhibit 20 is a true and correct copy of production metadata for

23   RS18F07 ██████████ and ██████████ files produced by Rimini and Easter Seals as part of post-

24   injunction discovery, including Bates Number, File Name, File Path, and MD5 Hash.

25   19.   Attached as Exhibit 21 is a true and correct copy of a list of 357 Bates numbers of

26   files with production metadata including (1) file name "██████████," (2) MD5 hash value of

27   "39e6a7d5d616ed7a5be819e3f60b9c38," and (3) a DATE_SORTABLE value of July 11, 2019.

28

DECLARATION OF JACOB J.O. MINNE IN SUPPORT OF ORACLE'S RESPONSE TO RIMINI'S
RESPONSE TO ORDER TO SHOW CAUSE

20.   Attached as Exhibit 22 is a true and correct copy of a list of 405 Bates numbers of files with production metadata including (1) file name "████████," (2) MD5 hash value of "ca081f93cf4c6ba9fde3b6ade6535666," and (3) a DATE_SORTABLE value of July 11, 2019.

21.   Attached as Exhibit 23 is a true and correct copy of a document Rimini produced to Oracle as part of discovery in this action as RSI007087466.

22.   Attached as Exhibit 24 is a true and correct copy of a document Rimini produced to Oracle as part of discovery in this action as RSI007329092.

23.   Attached as Exhibit 25 is a true and correct copy of excerpts from the transcript of the June 30, 2020 expert deposition of Owen Astrachan taken in this action.

24.   Attached as Exhibit 26 is a true and correct copy of excerpts of a document Rimini produced to Oracle as part of discovery in the *Rimini II* action as RSI2_014273465.

25.   Attached as Exhibit 27 is a true and correct copy of excerpts of a document Rimini produced to Oracle as part of discovery in the *Rimini II* action as RSI2_013418086.

26.   Attached as Exhibit 28 is a true and correct copy of excerpts of a document Rimini produced to Oracle as part of discovery in the *Rimini II* action as RSI2_015588159.

27.   Attached as Exhibit 29 is a true and correct copy of excerpts of a document Rimini produced to Oracle as part of discovery in the *Rimini II* action as RSI2_013094139.

28.   Attached as Exhibit 30 is a true and correct copy of a document Rimini produced to Oracle as part of discovery in the *Rimini II* action as RSI2_025104432.

29.   Attached as Exhibit 31 is a true and correct copy of excerpts of a document Rimini produced to Oracle as part of discovery in the *Rimini II* action as RSI2_030635285.

30.   Attached as Exhibit 32 is a true and correct copy of excerpts of a document Rimini produced to Oracle as part of discovery in the *Rimini II* action as RSI2_031739263.

DECLARATION OF JACOB J.O. MINNE IN SUPPORT OF ORACLE'S RESPONSE TO RIMINI'S RESPONSE TO ORDER TO SHOW CAUSE

1   I declare under penalty of perjury under the laws of the United States that the foregoing is

2   true and correct and that this declaration is executed at Daly City, California on June 9, 2021.

3

4   DATED: June 9, 2021   MORGAN, LEWIS & BOCKIUS LLP

5
                                           By: _____*/s/ Jacob J. O. Minne*_____
6   Jacob J. O. Minne

7   Attorneys for Plaintiffs Oracle USA, Inc.,
                                             Oracle America, Inc., and Oracle
8   International Corporation

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CERTIFICATE OF SERVICE

I hereby certify that on June 9, 2021, I electronically transmitted the foregoing **DECLARATION OF JACOB J.O. MINNE IN SUPPORT OF ORACLE'S RESPONSE TO RIMINI'S RESPONSE TO ORDER TO SHOW CAUSE** and publicly filed versions of **EXHIBITS 1-32** to the Clerk's Office using the CM/ECF System for filing and transmittal of a Notice of Electronic Filing to all counsel in this matter. all counsel being registered to receive Electronic Filing.

MORGAN, LEWIS & BOCKIUS LLP

DATED: June 9, 2021

By: _____ */s/ Benjamin P. Smith* _____
Benjamin P. Smith

Attorneys for Plaintiffs Oracle USA, Inc., Oracle America, Inc., and Oracle International Corporation